

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

PAULSON PRV HOLDING LLC et al

Plaintiff

v.

FAHAD GHAFAR; GLENDA ACEVEDO-
MARTINEZ, et al

Defendants

Civil No.: 23-cv-01521 SCC

CIVIL RICO

MOTION FOR JOINDER

TO THE HONORABLE COURT:

NOW APPEAR co-defendants GLENDALIZ ACEVEDO MARTINEZ and GGSG, LLC, through their undersigned counsel, and without submitting to the *in personam* or subject matter jurisdiction of this Honorable Court, very respectfully state and pray as follows:

1. The appearing defendants hereby join co-defendant Fahad Gaffar's "Motion for Entry of RICO Case Statement Order" (Docket #10).
2. The appearing defendants agree with co-defendant Gaffar's averment that the Complaint appears to allege damage to subsidiary companies, rather than to the plaintiffs themselves. Clarification in this regard is critical not just because of the arbitration agreement mentioned in co-defendant Gaffar's Motion, but also because the complaint only vaguely refers to the "Paulson Entities" in its allegations against the appearing defendants. See, e.g.

Complaint at paragraphs 49-73. In order to responsibly respond to these allegations, the appearing defendants must have proper notice of the specific “Paulson Entities” which were allegedly damaged by their actions and omissions, as claimed in the Complaint, since this information is directly relevant to potential issues of standing to sue, damages, and the legal validity of plaintiff’s RICO claims.

3. For this reason, the appearing defendants further request that the Court rule on Docket Number 10 as soon as possible, as it will directly affect the nature and substance of the responsive pleading which the Court has ordered must be filed by the appearing defendants no later than December 22, 2023. Moreover, in the event the Court grants the defendant’s request at Docket Number 10, the appearing defendants respectfully pray that the time to file a responsive pleading be extended for a reasonable time after the plaintiffs comply with any RICO Case Statement Order that may be issued.

WHEREFORE, for the above stated reasons, it is very respectfully requested that the Honorable Court grant the foregoing Motion.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico this 29th day of November, 2023.

I HEREBY CERTIFY that on this 29th day of November, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsels of record.

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